

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT COURT OF MASSACHUSETTS**

\_\_\_\_\_  
FRED DEN, individually and on behalf of  
all others similarly situated,  
Plaintiff,

v.

\_\_\_\_\_  
KAREN A. WALKER, EDWARD H. SNOWDEN  
and BOSTON COMMUNICATIONS GROUP,  
INC.,  
Defendants.

Civil Action No. 03-12211DPW

\_\_\_\_\_  
RONALD C. WON, Individually and on behalf of  
all others similarly situated,  
Plaintiff,

v.

\_\_\_\_\_  
BOSTON COMMUNICATIONS GROUP, INC.,  
KAREN A. WALKER, and EDWARD H.  
SNOWDEN,  
Defendants.

Civil Action No. 03-12244DPW

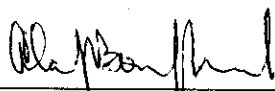
**DEFENDANTS' RULE 16.1 CERTIFICATION**

Pursuant to Local Rule 16.1, defendants Boston Communications Group, Inc., Karen A. Walker and Edward H. Snowden, and their counsel affirm that they have conferred:

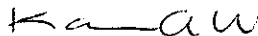
1. with a view to establishing a budget for the costs of conducting the full course, and various alternative courses, of the litigation; and
2. to consider the resolution of the litigation through the use of alternative dispute resolution programs, such as mediation, arbitration, and the alternative dispute resolution programs outlined in Local Rule 16.4.

KAREN A. WALKER, EDWARD H.  
SNOWDEN and BOSTON  
COMMUNICATIONS GROUP, INC.,

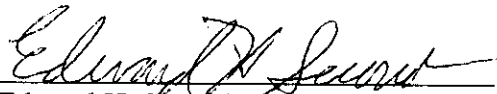
By their attorneys,



on behalf of Boston Communications  
Group, Inc.



Karen A. Walker



Edward H. Snowden

Date: January 21, 2004



Jeffrey B. Rudman (BBO #433380)

Andrea J. Robinson (BBO #556337)

Lisa M. Cameron (BBO #639951)

Hale and Dorr LLP

60 State Street

Boston, MA 02109

(617) 526-6000

**CERTIFICATE OF SERVICE**

I, Lisa M. Cameron, hereby certify that I caused a true and accurate copy of the foregoing document to be served upon the following by first class mail on this 22<sup>nd</sup> day of January, 2004:

Theodore M. Hess-Mahan  
Shapiro Haber & Urmy LLP  
75 State Street  
Boston, MA 02109  
(617) 439-3939

Christopher J. Keller  
Goodkind Labaton Rudoff & Sucharow LLP  
100 Park Avenue  
New York, NY 10017  
(212) 907-0700

Paul Geller  
Cauley Geller Bowman & Rudman LLP  
2255 Glades Road  
Suite 421A  
Boca Raton, FL 33431  
(561) 750-3000

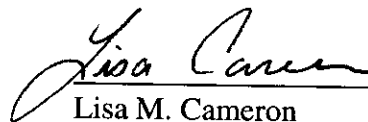
David Pastor (BBO #391000)  
Edward L. Manchur (BBO #316910)  
Gilman and Pastor, LLP  
Stonehill Corporate Center  
999 Broadway  
Suite 500  
Saugus, MA 01906  
(781) 231-7850

Marc A. Topaz  
Richard A. Maniskas  
Chad E. Kauffman  
Schiffrin & Barroway, LLP  
Three Bala Plaza East  
Suite 400  
Bala Cynwyd, PA 19004  
(610) 667-7706

Fred T. Isquith  
Christopher S. Hinton  
Wolf Haldenstein Adler Freeman  
& Herz LLP  
270 Madison Avenue  
New York, NY 10016  
(212) 545-4600

Bruce G. Murphy  
Law Offices of Bruce G. Murphy  
265 Llwyds Lane  
Vero Beach, FL 32963  
(772) 231-4020

Sandy A. Liebhard  
Joseph R. Seidman, Jr.  
Bernstein, Liebhard & Lifshitz, LLP  
10 E. 40<sup>th</sup> Street, 22<sup>nd</sup> Floor  
New York, NY 10016

  
\_\_\_\_\_  
Lisa M. Cameron